

# THE HARMAN FIRM, LLP

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September 27, 2016

**VIA ECF**

Hon. Colleen McMahon  
Chief U.S. District Judge  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**Re:    *Walter Elam v. Concourse Village, Inc., et al.***  
**15 CV 7215**

Dear Judge McMahon:

We represent Plaintiff Walter Elam in the above-referenced employment matter. We write to respectfully request a short extension of time to file an Opposition to Defendants' Motion for Summary Judgment. I have been out of the office for an extended period of time over the last several weeks, and we have focused on completing the pre-trial materials for the Court, which were due shortly after Defendants filed their motion.

Plaintiff's opposition is presently due by September 30, 2016. Plaintiff respectfully requests a two-week extension of time to file its opposition, which would amend the briefing schedule as follows: Plaintiff's opposition due by October 14, 2016, and Defendants' reply due by November 11, 2016.

This is Plaintiff's first request for an extension of this deadline. Defendants consent to Plaintiff's request. The Court granted Defendants' requests for a one-month extension of time (from July 29, 2016, to August 29, 2016) and a five-day extension of time (from August 29, 2016, to September 2, 2016) to file their Motion for Summary Judgment.

Thank you for your time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

cc:    Stefanie R. Munsky, Esq. (via ECF)  
Carla B. Gunther, Esq. (via ECF)